



SAXENA WHITE

10 Bank Street | 8th Floor | White Plains, NY 10606

Steven B. Singer  
ssinger@saxenawhite.com

February 5, 2021

**VIA ECF**

Honorable Denise L. Cote  
United States District Court Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

**MEMO ENDORSED**

Re: *In Re Perrigo Company PLC Securities Litigation*  
Case No.: 1:19-cv-00070-DLC

Dear Judge Cote:

We represent Lead Plaintiffs in the above-captioned matter. We respectfully submit this letter motion for leave to file under seal (i) the redacted Reply Memorandum in Further Support of Lead Plaintiffs' Motion for Leave to Amend the Second Amended Complaint (the "Reply"), and (ii) the accompanying Declaration of Steven B. Singer (the "Singer Declaration") and Exhibit 1 thereto, which Lead Plaintiffs seek to file under seal in their entirety. Lead Plaintiffs have simultaneously filed a redacted, public version of the Reply as well as unredacted, sealed versions of both the Reply and the Singer Declaration with Exhibit 1 thereto.


Pursuant to this Court's December 1, 2020 order (ECF No. 161) and Section 7(b) of Your Honor's Individual Practices in Civil Cases, Lead Plaintiffs previously met and conferred with Defendants regarding documents produced in discovery that are referenced, summarized or quoted in the Reply. Plaintiffs accordingly seek to file the above-referenced documents under seal based on Defendants' prior confidentiality designations and this Court's prior orders granting Defendants' letter motions to seal the information described above in connection with the parties' briefing on Plaintiffs' motion to amend. *See* ECF Nos. 182, 183, 185 and 190.

Respectfully,

/s/ Steven B. Singer  
Steven B. Singer

cc: Counsel for all parties (*via* ECF)

Granted. 02.08.21.

  
DENISE COTE  
United States District Judge